

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

TODD WOLF,

Plaintiff

v.

Case No. 23-CV-149

CITY OF SHEBOYGAN, et al.,

Defendants.

**DEFENDANT RYAN SORENSON'S RESPONSES AND OBJECTIONS TO
PLAINTIFF TODD WOLF'S REQUESTS FOR ADMISSION**

TO: Jennifer DeMaster
DeMaster Law LLC
361 Falls Road, #610
Grafton, WI 53024
attorney@jenniferdemaster.com

NOW COMES Defendant Ryan Sorenson ("Defendant"), and provides the following responses to Plaintiff, Todd Wolf's Requests for Admissions, denying each and every Request to Admit unless expressly admitted or qualified.

REQUEST TO ADMIT

REQUEST TO ADMIT NO. 1: Admit that, as Mayor, you have never provided any response or communication responding, in any way, to Mr. Wolf's legal counsel (Jennifer DeMaster) who requested Public Records from you under Wisconsin's open records laws despite receiving several emails between November 2022 – January 2023 seeking records relating to Mr. Wolf's employment or matters pertaining to the claims in the Complaint prior to the Complaint being filed in any Court. (For your convenience, the records requests sent to you are attached, in part, in Attachment 1 to these requests. Follow up emails demanding the records—also that you never responded to, or notifying you of forthcoming Mandamus petition, are not included but are in your City's email servers and archives from emails sent to and received by you.)

ANSWER: Defendant Sorenson objects to Request to Admit 1 as overly broad in both time and subject matter. As written, the public records request sought some categories of documents for a 2-year, 3+ month period of time. The public records request further sought documents that were not relevant to the claims and defenses in the above-

information for a two-year period of time that is not relevant to the claims and defenses in the above-captioned cause of action. The information requested is not relevant to Plaintiff's First Amendment prior restraint claim, violation of his due process property and liberty interests claims against Defendant Sorenson. The relevant time period for Claim One is November 7, 2022 – November 28, 2022. The relevant time period for Claim Five is November 7, 2022 – January 9, 2023. The relevant time period for Claim Six is January 9 – 10, 2023.

Subject to and without waiving his objections, Defendant Sorenson denies Request to Admit No. 6 as stated. Defendant Sorenson admits that he communicated with Mary Lynne Donohue from November 7, 2022 – January 9, 2023, but denies that it was on a minimum of a weekly basis. Defendant Sorenson denies that his communications with Defendant Donohue during this time period involved the November 7 or November 28, 2022 letters issued to Plaintiff, Plaintiff's leave or Plaintiff's termination.

REQUEST TO ADMIT NO. 7: Admit that you were present with Adams when the November 7 Directives on Todd Wolf were finalized, and the Sheboygan Police Department was contacted to serve the Directives on Todd Wolf at his home.

ANSWER: Admit.

REQUEST TO ADMIT NO. 8: Admit that you publicly stated that you believed Todd Wolf was lying (as published on November 9, 2022, at approximately 5:00 am in a Sheboygan Press article). (Your statement being, "my personal opinion is that the statements the administrator made are false.")

ANSWER: Defendant Sorenson denies Request to Admit 8 as stated. Defendant Sorenson further affirmatively states that the quote set forth in Request to Admit 8 is taken out of context. Defendant Sorenson affirmatively states that the November 9, 2022 article is a written document which speaks for itself and Defendant Sorenson denies any inconsistent characterizations thereof.

REQUEST TO ADMIT NO. 9: Admit that you worked with Hall and Adams in coordinating the directives on employees and witnesses pertaining to the scope of the investigation.

ANSWER: In responding to Request to Admit 9, Defendant Sorenson admits that he delivered a letter to each City employee Attorney Hall asked to interview as part of her investigation. Defendant Sorenson denies that he drafted the letters or had any part in identifying which city employees Attorney Hall chose to interview.

REQUEST TO ADMIT NO. 10: Admit that you were a witness for the investigation and provided documentation to Hall for said investigation.

ANSWER: Defendant Sorenson objects to this Request to Admit on the basis that it seeks information prepared in anticipation of litigation, attorney-work product and/or

VERIFICATION

I, Ryan Sorenson, do hereby verify, certify and state that the factual information contained in the foregoing Answers to Plaintiff's Requests for Admissions are true and correct to the best of my knowledge and belief.

Ryan Sorenson

Ryan Sorenson (Jan 26, 2024 14:03 CST)

Ryan Sorenson

Jan 26, 2024